

JONES DAY

250 VESEY STREET • NEW YORK, NEW YORK 10281.1047
TELEPHONE: +1.212.326.3939 • FACSIMILE: +1.212.755.7306

DIRECT NUMBER: (212) 326-3733
JGROSS@JONESDAY.COM

MEMO ENDORSED

April 30, 2019

BY ECF AND EMAIL

Hon. Andrew L. Carter
United States District Court
Southern District of New York
40 Foley Square
New York, NY 10007

USDC SDNY
DOCUMENT ELECTRONICALLY
FILED
DOC#:
DATE FILED: 5-2-19

Re: *Aaron Goodman v. Experian Information Solutions, Inc.*,
Case No. 1:19-cv-03070-ALC (S.D.N.Y.)
Defendant Experian's Request for Extension of Time

Dear Judge Carter:

Defendant Experian Information Solutions, Inc. ("Experian") writes to request an extension of time to answer, move, or otherwise respond to the complaint until June 17, 2019.

The current deadline for Experian to respond to the complaint is Thursday, May 2, 2019. This is the first request for an extension submitted by Experian in this matter. Experian is requesting the extension so that it has time to collect and review documents related to allegations in Plaintiff's complaint.

Plaintiff, who is proceeding *pro se*, opposes this request. On April 25, 2019, Experian mailed a letter to Plaintiff that (i) requested his consent to a 30-day extension to answer, move, or otherwise respond to the Complaint, and (ii) asked for certain identifying information—Plaintiff's full name, address, date of birth, and social security number—so that Experian could collect documents related to the allegations made in the Complaint. In making the latter request, Experian explained that it would "not use this information for any reason other than this litigation."

On April 30, 2019, Plaintiff responded via email, in which he declined Experian's request for a 30-day extension. Plaintiff did not provide a reason for his refusal to consent to the requested extension, but did offer Experian a 14-day extension, provided that Experian agree to explore settlement of Plaintiffs' claims in the interim. Plaintiff also refused to provide Experian with the requested identifying information, explaining that he "do[es] not consider sharing my private information with a stranger to be a prudent act."

COPIES MAILED

ALKHOBAR • AMSTERDAM • ATLANTA • BEIJING • BOSTON • BRISBANE • BRUSSELS • CHICAGO • CLEVELAND • COLUMBUS • DALLAS
DETROIT • DUBAI • DÜSSELDORF • FRANKFURT • HONG KONG • HOUSTON • IRVINE • JEDDAH • LONDON • LOS ANGELES • MADRID
MEXICO CITY • MIAMI • MILAN • MINNEAPOLIS • MOSCOW • MUNICH • NEW YORK • PARIS • PERTH • PITTSBURGH • RIYADH
SAN DIEGO • SAN FRANCISCO • SÃO PAULO • SHANGHAI • SILICON VALLEY • SINGAPORE • SYDNEY • TAIPEI • TOKYO • WASHINGTON

JONES DAY

Hon. Andrew L. Carter
April 30, 2019
Page 2

Because Plaintiff has declined to provide Experian with the identifying information necessary to collect relatively quickly any documents that may be related to Plaintiff's Complaint, Experian respectfully requests a 45-day extension to answer, move, or otherwise respond to the Complaint. This additional time is necessary for Experian to use the little information it has available to it via the Complaint to determine whether it can obtain documents related to the allegations therein. Moreover, without the opportunity to first review such documents, Experian is not in a position to evaluate whether this dispute can be resolved at this time, as Plaintiff suggests.

Accordingly, Experian respectfully requests an extension of time to answer, move, or otherwise respond to the complaint until June 17, 2019. Experian believes that an extension until June 17, 2019 will afford Experian sufficient time to obtain and review relevant documents.

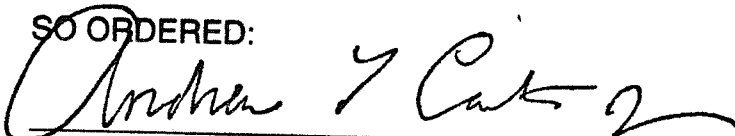
Respectfully submitted,

/s/ James M. Gross

James M. Gross
Counsel for Defendant
Experian Information Solutions, Inc.

cc: *Pro Se* Plaintiff (by Email and Overnight Mail)

SO ORDERED:



HON. ANDREW L. CARTER, JR.
UNITED STATES DISTRICT JUDGE

5-2-19